

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' COMBINED MOTION FOR ADDITIONAL
PAGES AND BRIEF IN SUPPORT**

Pursuant to Local Rule 7.1(D), Defendant Brad Raffensperger (“Secretary Raffensperger”), in his official capacity as Secretary of the State of Georgia and as Chair of the State Election Board of Georgia; David J. Worley, Rebecca N. Sullivan, Ralph F. Simpson, and Seth Harp, in the individual capacities and as members of the State Election Board (“State Board Members”); and the State Election Board of Georgia (“State Board”) (collectively, the “State Defendants”) move the Court for permission to submit a response to Plaintiffs’ motions for attorney fees [Docs. 595 and 596] and their detailed itemizations [Docs. 629, 631, 632] that exceed the page limit allowed by the Local Rules. This Court previously authorized a single response to all the filings. [Doc. 604].

Specifically, State Defendants move this Court for permission to file a response brief to Plaintiffs' Motion that does not exceed forty-five (45) pages. Plaintiffs' itemizations alone contain more than 900 pages of supporting documentation [Docs. 629, 631, 632]. Because any objections to motions for attorney fees must be made with specificity, *American Civil Liberties Union of Ga. v. Barnes*, 168 F. 3d 423, 428 (11th Cir. 1999), State Defendants must fully respond to all attached time records in their response brief, in addition to responding to the facts raised by Plaintiffs' motions.

A proposed order is attached.

This 12th day of November, 2019.

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing STATE DEFENDANTS' COMBINED MOTION FOR ADDITIONAL PAGES AND BRIEF IN SUPPORT has been prepared in Century Schoolbook 13-point, a font and type selection approved by the Court in L.R. 5.1(B).

/s/Bryan P. Tyson
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